

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:

JOSEPH MARTIN THOMAS,  
Debtor.

JOSEPH MARTIN THOMAS,

Movant,

v.

NO RESPONDENT.

: BANKRUPTCY NO. 20-10334 TPA  
: THE HONORABLE THOMAS P. AGRESTI  
:  
: CHAPTER 11  
:  
: DATE & TIME OF HEARING:  
: December 17, 2020 @ 9:30 a.m.  
:  
: OBJECTION/RESPONSE DATE:  
: November 27, 2020  
:  
: RELATED TO DOCUMENT NO. 212

**CERTIFICATION OF NO OBJECTION REGARDING  
APPLICATION TO EMPLOY SPECIAL COUNSEL (Document No. 212)**

The undersigned hereby certifies that, as of the date hereof, no answer, objection, or other responsive pleading to the Application to Employ Special Counsel filed November 10, 2020 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection, or other responsive pleading to the Application appears thereon. Pursuant to the Notice of Hearing with Response Deadline, objections to the Application were to be filed and served no later than November 27, 2020.

It is hereby respectfully requested that the Order attached to the Application be entered by the Court.

Dated: November 30, 2020

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY &  
KROTO, INC.

BY: /s/Michael P. Kruszewski  
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